

BUILDING SAFETY POLICY

Building Safety Statement of Intent

Brenmar Ltd is committed to delivering construction, installation, and refurbishment works to the highest standards of safety, structural integrity, and regulatory compliance. We operate in full alignment with the Building Safety Act 2022 (BSA 2022), the Building Regulations 2010 (as amended), and the Construction (Design and Management) Regulations 2015 (CDM).

We recognise that compliance requires both technical capability and an organisational culture rooted in behavioural competency and rigorous quality supervision. Brenmar Ltd ensures that all personnel, supervisors, contractors, and supply chain partners possess the appropriate Skills, Knowledge, Experience, and Behaviours (SKEB) to safely discharge their statutory duties in accordance with BS 8670-1:2024, PAS 8671, and PAS 8672. This policy applies to all Brenmar Ltd operations, directors, employees, agency workers, sub-contractors, and consultants across all projects, with heightened operational controls enforced for Higher-Risk Buildings (HRBs).

Statutory Framework & Organisational Capability

Brenmar Ltd aligns its operational policies and quality control systems with secondary legislation and the core provisions of the Building Safety Act 2022.

- **Part 2 & Part 3 (Building Control & HRBs):** Brenmar Ltd recognises the BSR as the building control authority for HRBs in England and strictly complies with the registration requirements for Building Control Approvers and Inspectors.
- **Part 4 (In-Occupation Safety & Accountable Persons):** Brenmar Ltd supports Principal Accountable Persons (PAPs) and Accountable Persons (APs) by delivering comprehensive, verified Golden Thread data during design, construction, and handover.
- **Secondary Legislation & Competency Standards:** Operational processes comply with Regulation 11Q of the Building Regulations, BS 8670-1:2024 (Built Environment Core Competence), PAS 8671 (Principal Designer Competence), and PAS 8672 (Principal Contractor Competence).

Competency & Behavioural Framework (SKEB)

In accordance with BS 8670-1:2024, Brenmar Ltd evaluates individual and organisational capability across four pillars: Skills, Knowledge, Experience, and Behaviour (SKEB). Technical expertise without suitable behaviour is treated as a compliance non-conformance.

Behavioural Competency Expectations

All individuals working on behalf of Brenmar Ltd must demonstrate the following baseline behaviours:

1. **Ownership & Accountability:** Taking direct responsibility for the safety and physical quality of work; never assuming compliance is someone else's responsibility.
2. **Speaking Up & Psychological Safety:** Actively identifying, reporting, and challenging poor workmanship, defective materials, or unauthorised design deviations without fear of reprisal.
3. **Quality Integrity:** Refusing to compromise on building standards, approved drawing specifications, or installation procedures due to commercial or schedule pressure.
4. **Transparent Communication:** Sharing accurate, real-time quality and installation data to maintain the Golden Thread.

5. **Continuous Development:** Participating in mandatory BSA awareness, quality assurance updates, and technical CPD.

Workforce Supervision, Instruction & Quality Compliance

To meet the requirements of the Building Safety Act 2022, Regulation 11Q, and Constructionline standards, Brenmar Ltd enforces explicit supervisory arrangements to guarantee that the physical quality and regulatory compliance of all installed works strictly meet statutory building requirements.

Supervisory Competence & Allocation

- **Assessed Competence:** All Brenmar Site Supervisors and Project Managers are vetted for technical competence under PAS 8672 and hold accredited site supervision qualifications (e.g., SSSTS/SMSTS, NVQ Level 4/6 in Site Supervision/Management).
- **Risk-Based Supervision Ratios:** Direct supervisory oversight is assigned based on structural complexity and trade criticality. High-risk installations—including fire stopping, compartmentation, structural fixings, and electrical systems—require 100% direct supervisory oversight and verification.
- **Sub-contractor Oversight:** All key sub-contractor roles operate under the direct control of a designated Brenmar Site Supervisor. Sub-contractor supervisors must submit daily quality logs and trade check sheets prior to closing out work packages.

Technical Instruction & Information Flow

- **Approved Technical Data via Procore:** Supervisors receive and distribute up to date, "Issued for Construction" drawings, manufacturer technical datasheets, and design specifications using Procore. Working from unapproved or superseded documents is strictly prohibited.
- **Task Quality Briefings:** Before starting any work package, Supervisors conduct mandatory Technical Toolbox Talks and Task Quality Briefings covering:
- Applicable Building Regulation requirements (e.g., Approved Document B for Fire Safety, Approved Document P for Electrical).
- Manufacturer installation instructions and tolerance limits.
- System interface details with adjoining construction elements.
- **Language & Clear Instruction:** Supervisors utilise visual installation guides, translated method statements, and bilingual trade leads where necessary to ensure clear understanding across the workforce.

Quality Verification, Hold Points & Inspection Test Plans (ITPs)

Supervision is enforced through project-specific Inspection & Test Plans (ITPs) to verify building quality before work is concealed:

- **Mandatory Hold Points:** Supervisors enforce strict "Hold Points" for critical building details (e.g., fire-stopping penetration seals, cavity barriers, structural connections, wiring containment). Work cannot proceed past a Hold Point without written supervisor inspection and photo sign-off in Procore.
- **First-Off Quality Benchmarking:** Supervisors perform a "First-Off Inspection" on the initial installation of any repetitive detail. Once approved, this serves as the benchmark standard for all subsequent works.
- **Non-Conformance Management (NCR):** Work failing to meet statutory building specifications is immediately stopped, logged as an NCR in Procore, and rectified. Re-inspection and formal sign-off by a competent supervisor are required before work resumes.

Operational Controls & Duty Holder Arrangements

Client Duty Awareness Verification & Duty Holder Discharge

Brenmar Ltd accepts and fulfils the statutory duties of Principal Contractor and Contractor under the Building Regulations (Amendment) Regulations 2023 and CDM 2015.

To ensure Brenmar Ltd is fully satisfied that the Client is fully aware of their statutory duties under the Building Safety Act 2022, CDM Regulations 2015, and Building Regulations 2010 *prior to work starting on site*, Brenmar Ltd enforces a strict three-stage verification mechanism:

1. **Formal Appointment & Duty Disclosure Letters:** Brenmar Ltd issues Document SDRH078 (CDM & BSA Duty Holder Responsibilities Notice) to the Client alongside the formal letter of appointment. This document clearly outlines the Client's legal duties under the BSA 2022 (including appointing competent duty holders, managing building safety risks, and funding Golden Thread maintenance). Brenmar Ltd requires a countersigned declaration of receipt and agreement from the Client before site works commence.
2. **Contractual Terms & Conditions:** All commercial contracts issued by Brenmar Ltd include explicit, legally binding clauses detailing the Client's duties under the Building Safety Act 2022. Contracts specify that work will not commence until statutory Building Control approvals (or Gateway approvals for HRBs) are secured by the Client/Principal Designer.
3. **Pre-Start Meeting Agendas & Formal Minutes:** Building Safety Act compliance is a mandatory, standing agenda item at all pre-commencement meetings. The meeting agenda explicitly covers:
 - a) Client Statutory Duties under BSA 2022 & CDM 2015.
 - b) Verification of Principal Designer and Principal Contractor formal appointments.
 - c) Arrangements for Golden Thread management and change control escalation.
 - d) Confirmation of Building Control authority / BSR notifications.
 - e) Formal minuting and signed client endorsement of these pre-start discussions.

The Golden Thread of Building Information

- **Digital Integrity:** Brenmar Ltd uses Procore as its primary digital platform to collect, store, and transfer building safety and quality information throughout the project lifecycle.
- **Traceable Records:** Quality checklists, supervisor signoffs, photographs, test certificates, and material approvals are digitally captured to form a complete audit trail supporting the Safety Case Report.

Change Management & BSR Notification

- **Mandatory Logging:** All design, material, and structural variations must be logged in Procore with full technical justification by a competent person.
- **Notifiable/Major Changes:** Any change affecting structural integrity, fire strategies, or key building systems will be evaluated and, where required, formally submitted to the Building Safety Regulator (BSR) detailing:
 - Reason for the proposed change.
 - All specialist technical advice sought (including dissenting opinions).
 - Advisor credentials, contact details, and affected drawings/documents.
 - Works affected by major changes will not proceed until statutory clearance or BSR approval is secured.

Occurrence Reporting & Stop-Work Authority

- **Mandatory Occurrence Reporting (MOR):** Safety-critical defects, structural failures, or fire safety non-compliances must be reported immediately to the BSR and internal SHEQ team within statutory timelines.
- **Stop-Work Authority:** All personnel, supervisors, and sub-contractors hold explicit authority to suspend work if an activity poses an immediate or potential threat to building safety or regulatory compliance. Works remain paused until corrective actions are verified by the SHEQ Manager.

Material Sourcing & Procurement

1. **Regulatory Compliance:** All materials are procured in strict accordance with UK/BS/EN safety standards, project specifications, and fire resistance classifications (Part B).
2. **Traceability:** Procurement teams maintain complete traceability records for fire-stopping products, structural elements, and safety-critical components as part of the Golden Thread.
3. **Prohibition of Unapproved Substitutions:** On-site material substitutions without formal change management approval from the Principal Designer and Site Supervisor are strictly prohibited.

4. **Environmental Alignment:** Material sourcing aligns with Brenmar's ISO 14001 Environmental Management System without compromising fire or structural integrity.

Supply Chain Management

1. **Sub-contractor Vetting:** Sub-contractors must complete a comprehensive Pre-Qualification Questionnaire (PQQ) evaluating their organisational competence, PAS 8672 compliance, quality control procedures, and BSA 2022 arrangements.
2. **Contractual Clauses:** All contracts issued by Brenmar Ltd include mandatory clauses requiring compliance with the BSA 2022, Building Regulations, and Brenmar's supervision and quality protocols.
3. **Right to Terminate:** Brenmar Ltd reserves the right to terminate contracts immediately if a severe or unrectified breach of building safety legislation or quality standards occurs within the supply chain.
4. **Periodic Auditing:** Brenmar Ltd conducts periodic risk-based audits of sub-contractor recruitment practices, qualification records, and site quality compliance.

Fire Safety Controls & Emergency Procedures

- HSG168 Alignment: Site fire safety arrangements comply with HSG168 (*Fire Safety in Construction*) and project-specific Fire Risk Assessments (FRA).
- Hot Works Controls: Hot works (welding, cutting, grinding, soldering) require a formal Hot Work Permit issued by a competent Site Supervisor following verification of risk assessments and local fire controls.
- Fire Stopping Integrity: Existing and new fire compartmentation barriers must be maintained. Any temporary breach created during works must be reinstated using certified materials and signed off by the Site Supervisor in Procure.

Reporting & Whistleblowing

Brenmar Ltd operates an open-door reporting policy across all management levels. Any employee, agency worker, or sub-contractor who suspects a building safety defect, regulatory breach, or quality failure must report it immediately.

Primary BSA Compliance Contact: Louise Hinckley

Reporting Contact Number: 01489 891196

Brenmar Ltd guarantees that no individual will suffer detriment, discrimination, or reprisal for raising a genuine building safety or quality concern in good faith.

Policy Review & Executive Sign-Off

This policy is reviewed annually by Top Management or sooner if triggered by legislative amendments, organisational changes, or BSR guidance updates.

Signed



Mark Harvey

Director

September 2026